

TSD-RCRA INSPECTION REPORT
(Interim Status Facility - 329 IAC 3.1-10)

EPA ID # IND 077 085 916 NAME Gary Development Co. Inc

MAILING ADDRESS: P.O. Box 6056
Gary, Indiana 46406

LOCATION ADDRESS: Cline Ave. # T90
Gary

CONTACT: Mr. Larry Hagan PHONE 219/944-7858

OWNERSHIP: Gary Dev Co. PHONE Lake County

STATUS CODE: 5

1=Active	3=Dead Mail	4=Non-Notifier
6=Non-Handler	2=Obsolete ID #	9=Superfund Site
5=Out-of-Business		

Person(s) interviewed:	Title:	Telephone:
<u>Larry Hagan Jr</u>	<u>Foreman</u>	<u>219/944-7858</u>
<u></u>	<u></u>	<u></u>
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Inspector(s):	Agency:	Telephone:
<u>Bob Blaesing</u>	<u>I.D.E.M</u>	<u>219/881-6712</u>
<u></u>	<u></u>	<u></u>
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Date of inspection: 2/1/95 Time of Inspection 10:00 am

The Indiana Hazardous Waste Rules, 329 IAC 3.1, incorporates by reference federal standards which have been published in the Code of Federal Regulations as 40 CFR 260 through 40 CFR 270. Citations contained in this inspection form reference the federal rules as of July 1, 1991, except where the State rule substitutes full text language, in which case the specific 329 IAC 3.1 citation will be used.

Installation Processes by Process Code (EPA Form 3510-3)

S01 <input type="checkbox"/> Container storage	T03 <input type="checkbox"/> Incinerator treatment
S02 <input type="checkbox"/> Tank storage	T04 <input type="checkbox"/> Other treatment
S03 <input type="checkbox"/> Waste pile storage	D79 <input type="checkbox"/> Injection well disposal
S04 <input type="checkbox"/> Surface impoundment storage	D80 <input checked="" type="checkbox"/> Landfill disposal
T01 <input type="checkbox"/> Tank treatment	D81 <input type="checkbox"/> Land application disposal
T02 <input type="checkbox"/> Surface impoundment treatment	D83 <input type="checkbox"/> Surface impoundment disposal

If Part A process codes are listed above as T04 please describe the process involved below:

A. GENERAL INFORMATION

- 1) Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.
- 2) Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.
- 3) Type of Operation, Products Manufactured, Processes Utilized, Size of Operation, Concentrate on processes that produce waste (hazardous or nonhazardous)

Gary Development Co is currently an inactive landfill which
mainly accepted municipal/special waste from 1975 to
1989. The facility allegedly accepted (F-listed) hazardous
wastes from off-site in 1981.

4) If any of the wastes are subject to the categories listed below, please check those areas and utilize the provided appendices.

	<u>YES</u>	<u>NO</u>
a) Waste Oil Fuel	—	<u>X</u>
b) Hazardous Waste Fuel	—	<u>X</u>
c) Tanks	—	<u>X</u>
d) Container Management	—	<u>X</u>
e) Generator Accumulation	—	<u>X</u>
f) Waste Pile	—	<u>X</u>
g) Surface Impoundment	—	<u>X</u>
h) Landfill	<u>X</u>	—
i) Process Vents	—	<u>X</u>
j) Equipment Leaks	—	<u>X</u>

5) Hazardous Waste Streams/EPA #	Source	Rate	Disposition	LDR Treatability Group (WW/NWW)
<u>NA 100</u>				
<u>Inactive landfill</u>	<u>Generates</u>		<u>leachate</u>	

6) Have both listed and characteristic waste codes been assigned, where a listed waste exhibits a characteristic? 40 CFR 268.9

<u>YES</u>	<u>NO</u>	<u>NA</u>
—	—	<u>✓</u>

YES NO NA

- 7) Does the facility handle any California List Wastes?
(liquid hazardous waste with greater than 50 ppm PCB,
greater than 134 ppm nickel, greater than 130 thallium,
etc.)

— — ✓

- 8) List all wastes not listed above.

Waste	Process Generating Waste	Rate	Disposition
<u>Leachate</u>	<u>Landfill operations</u>	<u>unknown</u>	<u>collected and held</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

- 9) If the company claims a reuse or reclaim exemption please include the following information:

	Waste Type	Generation Rate	How reclaimed & by Whom	Quantity stored on Site
A.	<u>NA</u>	_____	_____	_____
B.	_____	_____	_____	_____

- 10) Hazardous Waste On-Site

Amount	How Stored	Comments
<u>NA</u>	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

- 11) Indicate any TSD activities which have been omitted from or are not clear on the facility map (for the purpose of determining if expansion has occurred)

(40 CFR 270.13)

(HWIMS 610)

NA

- 12) Is the Biennial Report accurate? NA

- 13) Note any non-RCRA violations (open dumping, dumping in city sewer without pretreatment program, OSHA, etc.)

None Noted

- 14) Additional Comments:

The facility has installed methane recovery wells-
They are presently testing to see if landfill
will generate an appropriate amount of landfill gas.

B. LAND BAN TREATMENT STANDARDS

(HWIMS 700) OK DF NI NA

- | | | | | |
|---|---|---|---|---|
| 1) Does owner/operator dilute prohibited wastes to meet treatment standard criteria, or render them nonhazardous, as a substitute for adequate treatment? <u>40 CFR 268.3</u> | — | — | — | ✓ |
| 2) Do treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? <u>40 CFR 268.9</u> | — | — | — | ✓ |
| 3) Does generator specify alternative treatment standards for lab packs?
If yes, see <u>40 CFR 268.42(c)(2)</u> | — | — | — | ✓ |
| 4) Does generator mix wastes with different treatment standards for a constituent of concern? | — | — | — | ✓ |
| a. If yes, did generator select most stringent treatment standards? | — | — | — | ✓ |
| 5) Does the generator handle any wastes with a LDR variance (national capacity, case-by-case, etc.)? | — | — | — | ✓ |

C. ON-SITE TREATMENT

Not occurring

(HWIMS 700)

- | | | | | |
|--|---|---|---|-----------------|
| 1) Does the generator treat wastes in 90-day tanks or containers? If NA, go to next section. | — | — | — | ✓ ^{NA} |
| 2) Does the generator treat the wastes to meet appropriate treatment standards? | — | — | — | — |
| a. If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted?
<u>40 CFR 268.7(a)(4)</u> | — | — | — | — |
| 3) Does the plan fulfill the following: | — | — | — | — |
| a. Based on a detailed chemical and physical analysis of a representative sample | — | — | — | — |
| b. Contains information necessary to treat the wastes in accordance with LDR | — | — | — | — |

- | | <u>OK</u> | <u>DF</u> | <u>NI</u> | <u>NA</u> |
|--|-----------|-----------|-----------|-----------|
| 4) Has the plan been filed with the Regional Administrator or IDEM? | — | — | — | — |
| 5) Are characteristic wastes which have been rendered nonhazardous shipped to a solid waste facility? | — | — | — | — |
| a. If yes, is a notification and a certification for each shipment sent to the Regional Administrator (prior to 2/24/92) or IDEM?
<u>40 CFR 268.9(d)(1) and 268.7(b)(5)</u> | — | — | — | — |

D. STORAGE *No Storage* (HWIMS 700)

- | | | | | |
|--|---|---|---|---|
| 1) Is the amount of hazardous waste in the storage area(s) equal to or less than the capacity allowed in the Part A? List type and amount of any storage capacity overages? <u>40 CFR 270.72</u> | — | — | — | — |
| <hr style="border: 0.5px solid black;"/> | | | | |
| 2) Are all containers clearly marked to identify the contents and date(s) entering storage or is such information available in the operating log?
<u>40 CFR 268.50(a)(2)(i)</u> | — | — | — | — |
| 3) Have wastes been stored for less than one year? | — | — | — | — |
| a. If no, can the facility show that such storage is necessary to facilitate proper recovery, treatment or disposal. <u>40 CFR 268.50(c)</u> | — | — | — | — |

E. TREATMENT *Not occurring* (HWIMS 700)

- | | | | | |
|---|---|---|---|---|
| 1) Does the facility treat hazardous waste other than in 90-day tanks and containers? If NA, go to next section. | — | — | — | — |
| 2) Are required technologies used to treat wastes which have treatment standards expressed as technologies? <u>40 CFR 268.40(b)</u> (HWIMS 700) | — | — | — | — |

- | | <u>OK</u> | <u>DF</u> | <u>NI</u> | <u>NA</u> |
|--|-------------------------------------|--------------------------|--------------------------|--------------------------|
| 3) Are alternative methods approved?
<u>40 CFR 268.2</u> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4) Is the LDR treatment standard lower than the
Characteristic level? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| a. If yes, does the facility manage the waste as
restricted until treatment standards are met?
<u>40 CFR 268.9</u> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 5) Does the facility test residues from all treatment
processes? <u>40 CFR 268.7</u> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

F. REQUIRED NOTICES

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|--------------------------|
| 1) Has the Regional Administrator/Environmental
Management Board been notified regarding: | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| a. Receipt of hazardous waste from a
foreign source?
<u>40 CFR 265.12(a)</u> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| (HWIMS 300) | | | | |
| b. Facility expansion?
<u>40 CFR 270.72(b)</u> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| (HWIMS 610) | | | | |
| c. Change of owner or operator?
<u>40 CFR 265.12(b)</u> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| (HWIMS 300) | | | | |

G. GENERAL WASTE ANALYSIS:

(HWIMS 310)

- 1) Has the owner or operator made a detailed
chemical and physical analysis of the waste
either through testing or knowledge of
the process?
40 CFR 265.13(a)1

See DOV # 1
____ ☒ ____ ____

	<u>OK</u>	<u>DF</u>	<u>NI</u>	<u>NA</u>
2) Does the owner or operator have a detailed waste analysis plan on file at the facility? <u>40 CFR 265.13(b)</u>	—	✓ <i>See DOV #2</i>	—	—
3) Does the waste analysis plan contain:				
a. Parameters (and rationale for their choice)	—	✓	—	—
b. Test Methods	—	✓	—	—
c. Sampling method for representative sample	—	✓	—	—
d. Frequency of analysis (and rationale)	—	✓	—	—
e. Off-site only: waste analysis form generators	—	✓	—	—
f. Additional waste analysis needed for:				
i. <u>265.200 Tanks</u>	—	—	—	✓
ii. <u>265.225 Impoundment</u>	—	—	—	✓
iii. <u>265.252 Waste Pile</u>	—	—	—	✓
iv. <u>265.273 Land Treatment</u>	—	—	—	✓
v. <u>265.341 Incinerators</u>	—	—	—	✓
vi. <u>265.375 Thermal Treatment</u>	—	—	—	✓
vii. <u>265.402 Other Treatment</u>	—	—	—	✓
viii. <u>268 LDR Standards</u>	—	—	—	✓

4) Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? <u>40 CFR 265.13(c)</u>	—	✓ <i>See DOV #2</i>	—	—
5) Is the waste analysis plan followed?	—	✓	—	—

H. GENERAL INSPECTION REQUIREMENTS

(HWIMS 320)

1) Does the owner or operator inspect the facility for deterioration, malfunctions, operator errors, and discharges of hazardous waste that may affect human health or the environment? <u>40 CFR 265.15(a)</u>	—	✓ <i>See DOV #3</i>	—	—
--	---	---------------------	---	---

	OK	DF	NI	NA
2) Does the owner or operator have an inspection schedule at the facility? <u>40 CFR 265.15(b)2</u>	—	✓	—	—
<i>See DOV # 3</i> <i>No inspection records or schedule</i>				
3) If so, does the schedule address the inspection of the following items: <u>40 CFR 265.15(b)1</u>				
a. Monitoring equipment?	—	—	—	✓
b. Safety and emergency equipment?	—	—	—	✓
c. Security devices (including fences)?	—	—	—	✓
d. Operating and structural equipment (ie. dikes, pumps, etc.)?	—	—	—	✓
e. Type of problems to be looked for during the inspection (e.g. leaky fittings, defective pump, etc.)? <u>40 CFR 265.15(b)(2)</u>	—	—	—	✓
f. Inspection frequency (based upon the possible deterioration rate of the equipment)? <u>40 CFR 265.15(b)(4)</u>	—	—	—	✓
g. Does the inspection frequency include:				
i. Weekly container storage? (See 265.174)	—	—	—	✓
ii. Daily and Weekly Tank Storage? (See 265.195)	—	—	—	✓
iii. Daily freeboard and weekly dike inspection for surface impoundments? (See 265.226)	—	—	—	✓
iv. Landfills, Waste Piles, Thermal treatment, Chemical, Physical, and Biological treatment should be inspected as determined by deterioration rate and daily at loading and unloading areas (where spills are likely) (See 265.15(b)(4))	—	—	—	✓

	<u>OK</u>	<u>DF</u>	<u>NI</u>	<u>NA</u>
4) Does Owner or Operator follow the written inspection schedule as outlined? <u>265.15(b)(1)</u>	—	—	—	✓
5) Are areas subject to spills inspected daily when in use? <u>265.15(b)(4)</u>	—	—	—	✓
<u>The facility does not have inspection records or schedules</u>				
6) Does the owner or operator maintain an inspection log or summary of owner or operator inspections? <u>40 CFR 265.15(d)</u>	—	✓ <i>See DOV #4</i>	—	—
7) Does the inspection log contain the following information: <u>40 CFR 265.15(d)</u>	—	—	—	✓
a. The date and time of the inspection?	—	—	—	✓
b. The name of the inspector?	—	—	—	✓
c. A notation of the observations made?	—	—	—	✓
d. The date and nature of any repairs or remedial actions?	—	—	—	✓

I. PERSONNEL TRAINING

1) Do personnel training records include: (HWIMS 330)

See DOV # 5

- | | | | | |
|---|---|---|---|---|
| a. Job titles for the positions related to HWM
<u>40 CFR 265.16(d)1</u> | — | ✓ | — | — |
| b. The name of the employees filling each job title?
<u>40 CFR 265.16(d)(1)</u> | — | ✓ | — | — |
| c. Job descriptions including the required skills,
education, or other qualifications and the duties
of the personnel assigned to the position?
<u>40 CFR 265.16(d)2</u> | — | ✓ | — | — |

Check categories for which job titles/descriptions are available (please include the supervisors of each category in that category when reviewing documents).

Emergency coordinator___ Training coordinator___ Emergency response personnel___
Inspectors___ Material handlers___ Container labelers ___ Manifesters___
Recordkeepers ___

- | | | | | |
|---|---|---|---|---|
| d. Description of both introductory and continuing
training required for each job?
<u>40 CFR 265.16(d)(3)</u> | — | ✓ | — | — |
| e. Records of training required in (d)?
<u>40 CFR 265.16(d)4</u> | — | ✓ | — | — |

Describe in general the type of training program in use at the facility.

The facility claims they are a non-RCRA facility and therefore
are not required to have personnel training records.

- | | | | | |
|---|---|---|---|---|
| f. Did facility personnel receive the required
training including: | | | | |
| i) classroom or on the job | — | ✓ | — | — |
| ii) within 6 months of hire | — | ✓ | — | — |
| iii) annual review of training? | — | ✓ | — | — |

- g. Are all training records maintained for current personnel and for at least three years for former employees?
40 CFR 265.16(e)

OK DF NI NA

— ✓ See DOV #5 — —

J. CONTINGENCY PLAN AND EMERGENCY PROCEDURES (HWIMS 350)

- 1) Does the Contingency Plan contain the following information:

- a. The actions facility personnel must take to comply with 265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable).

— ✓ See DOV #6 — —

- b. A description of arrangements agreed by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services.

— ✓ — —

- c. Names, addresses, and phone numbers of all persons qualified to act as emergency coordinators?

— ✓ — —

- d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

— ✓ — —

40 CFR 265.52(e)

- e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.)

— ✓ — —

40 CFR 265.52(f)

OK DF NI NA

2) Emergency Coordinator:

- a. Is the facility Emergency Coordinator identified?
40 CFR 265.52(d)

— ✓ — — See DOV # 6

- b. Is coordinator familiar with all aspects of site operation and emergency procedures?
40 CFR 265.55

— ✓ — —

- c. Does Emergency Coordinator have the authority to carry out the Contingency Plan?
40 CFR 265.55

— ✓ — —

The facility does not have a contingency plan.

K. PREPAREDNESS AND PREVENTION

- 1) Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?

— ✓ — — See DOV # 6

40 CFR 265.37

(HWIMS 340)

- 2) Are copies of the Contingency Plan available at the site and local emergency organizations?

— ✓ — —

40 CFR 265.53

(HWIMS 350)

3) Emergency Procedures

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 40 CFR 265.56 (329 IAC 3-18-7)?

— — — ✓

(HWIMS 350)

L. MANIFEST SYSTEM (off-site facilities)
(HWIMS 360)

- | | <u>OK</u> | <u>DF</u> | <u>NI</u> | <u>NA</u> |
|---|-----------|-----------|-----------|-----------|
| 1) Does the facility follow the procedures listed in <u>265.71</u> for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.) | — | — | — | ✓ |
| 2) Are records of past shipments retained for three (3) years? <u>40 CFR 265.71(b)5</u> | — | — | — | ✓ |
| 3) Has the facility submitted copies of hazardous waste manifests to the Department within five (5) working days after receiving hazardous waste? (This requirements applies to both Indiana's and other states hazardous waste manifests)? | — | — | — | ✓ |
| 4) Does the owner or operator meet requirements regarding manifest discrepancies? (Off-site facilities only) <u>40 CFR 265.72</u> | — | — | — | ✓ |
| 5) Unmanifested Waste Reports: | | | | |
| a. Has the facility accepted any hazardous waste from an off-site generator subject to 329 IAC 3.1-7-3 (3-8-1) without a manifest or shipping paper? <u>40 CFR 265.76</u> | — | — | — | ✓ |
| b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type and date received for each unmanifested hazardous waste shipment. | | | | |
| <hr/> | | | | |
| <hr/> | | | | |
| <hr/> | | | | |
| c. Has the facility submitted an unmanifested waste report within 15 days after receiving the waste? | — | — | — | ✓ |

M. CLOSURE/POST CLOSURE

	OK	DF	NI	NA
1) Is the closure plan available for inspection? <u>40 CFR 265.112(a)</u> (HWIMS 390)	—	✓	See	Dov # 7
2) Is the post-closure plan available for inspection? (for disposal facilities only) <u>40 CFR 265.118(a)</u> (HWIMS 390)	—	✓	—	—
3) Has the closure cost and post closure cost estimate been revised annually to account for inflation. <u>(329 IAC 3.1-14-3)</u> (HWIMS 400)	—	✓	—	—

N. OPERATING RECORD

(HWIMS 370)

1) Does owner or operator have a operating record? <u>40 CFR 265.73(a)</u>	—	✓	See	Dov #8
2) Does the owner or operator maintain an operating record that contains the following information?				
a. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR 265 Appendix I (including tanks)? <u>40 CFR 265.73(b)(1)</u>	—	—	—	✓

Summarize how the facility tracks the method and date of TSD activity.

The facility does not have an operating record

- b. The location and quantity of each hazardous
waste within the facility? (This information
shall be cross referenced to a specific
manifest number if the waste was accompanied
by manifest.)
40 CFR 265.73(b)(2)

— — — ✓

Summarize how the facility tracks the location and quantity of waste.

No operating record for review to track location and quantity of wastes.

- | | <u>OK</u> | <u>DF</u> | <u>NI</u> | <u>NA</u> |
|---|-----------|-----------|-----------|-----------|
| c. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross referenced to specific manifest number, if accompanied by a manifest.)
<u>40 CFR 265.73(b)(2)</u> | — | — | — | ✓ |
| d. Records and results of all waste analyses, trial tests, monitoring data, and operating inspections, including those conducted for LDR standards?
<u>40 CFR 265.73(b)(3)(5)(6)</u> | — | — | — | ✓ |
| e. Reports detailing all incidents that required implementation of the Contingency Plan?
<u>40 CFR 265.73(b)(4)</u> | — | — | — | ✓ |
| f. All closure and post closure costs as applicable?
<u>40 CFR 265.73(b)(7)</u> | — | — | — | ✓ |
| g. Copies of LDR notifications and certifications?
<u>40 CFR 265.73 b (11)(13)(15)</u> | — | — | — | ✓ |

The facility is a closed landfill and has not received (or shipped) any wastes that would have LDR notification/certification since 1989.

O. GROUNDWATER MONITORING

Complete this section for facilities that treat, store, or dispose of hazardous waste in landfills, surface impoundments and/or by land treatment.

- Has the owner or operator of the facility implemented a groundwater monitoring system?
40 CFR 265.90(a) (HWIMS 380) ✓ for solid waste landfill regulations only
- Has the owner or operator of the facility implemented an alternate groundwater monitoring system as described in 265.90(d)? (HWIMS 380) — — — ✓

Gary Dev Co has a gw monitoring program operated under SW regs.

GENERATOR REQUIREMENTS

Complete the following sections if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

P. MANIFEST SYSTEM (generator) OK DF NI NA
(HWIMS 110)

- | | OK | DF | NI | NA |
|---|----|----|----|-----------------|
| 1) For hazardous waste shipments to Indiana facilities (or hazardous waste shipments to states that do not supply manifests) has the generator used the Indiana Hazardous Waste Manifest?
<u>329 IAC 3.1-7-4</u> | — | — | — | ✓ |
| 2) Does the operator have copies of the manifest available for review?
<u>40 CFR 262.40 (329 IAC 3.1-7-6)</u> | — | — | — | ✓ ^{no} |
| 3) Have manifests been retained for 3 years?
<u>(40 CFR 262.40)</u> | — | — | — | ✓ ^{no} |
| 4) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. | 0 | | | |
| 5) Do the manifest forms examined contain the following information?
<u>40 CFR 262.21 (329 IAC 3.1-7-8)</u> | — | — | — | ✓ ^{no} |
| a. Manifest document number? EPA ID No. + Unique 5 digit No.? | — | — | — | ✓ ^{no} |
| b. Name, mailing address, telephone number, and EPA ID number of generator? | — | — | — | ✓ |
| c. Name, telephone number (3.1-7-11) and EPA ID Number of Transporter(s)? | — | — | — | ✓ |
| d. Name, Address, telephone number (3.1-7-11) and EPA ID Number of designated permitted facility? | — | — | — | ✓ |

	<u>OK</u>	<u>DF</u>	<u>NI</u>	<u>NA</u>
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	—	—	—	✓
f. The total quantity of waste(s) and the type and number of containers loaded?	—	—	—	✓
g. Required waste minimization certification?	—	—	—	✓
h. Required signatures?	—	—	—	✓
i. EPA hazardous waste numbers (3.1-7-11)?	—	—	—	✓
j. Handling Codes (3.1-7-11)?	—	—	—	✓
k. Additional waste numbers included in box J.	—	—	—	✓
6) Has the generator submitted copies of hazardous waste manifests to the Department within five (5) working days after shipping hazardous waste? (This requirement applies to both Indiana's and other states hazardous waste manifests). <u>329 IAC 3.1-7-6</u>	—	—	—	✓
7) Reportable exceptions: <u>40 CFR 262.42</u> (HWIMS 180)				
a. For manifests examined (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment.	—	—	—	—
b. For manifests indicated in question (7a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Commissioner.	—	—	—	—

Q. EPA IDENTIFICATION NUMBERS

(HWIMS 090)

OK DF NI NA

- 1) Has the generator received an EPA identification number prior to treating, storing, disposing of, transporting, or offering for transportation, hazardous waste? 40 CFR 262.12(a)

✓

- 2) Has the generator offered his hazardous waste to transporters or to TSD facilities that have received an EPA identification number? 40 CFR 262.12(c)

 ✓

R. INTERNATIONAL SHIPMENTS

Not Applicable

(HWIMS 190)

- 1) Has the installation imported or exported hazardous waste? 40 CFR 262.50

RSB ✓

(If answered Yes, complete the following as applicable.)

- a. Exporting hazardous waste; has a generator:

- i. Notified the administrator and OSHWM/IDEM in writing?

 ✓

- ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?

 ✓

- iii. Met the Manifest requirements?

 ✓

- b. Importing hazardous waste; has the generator met the manifest requirements?

 ✓

S. LAND BAN NOTIFICATION REQUIREMENTSNot
Reviewed

(HWIMS 700)

OK DF NI NA

- 1) Does the generator provide a notification to the TSD facility with each shipment, even if waste meets treatment standards? 40 CFR 268.7

- 2) Does the notification include the following: (if possible, make copies of, or record information from notification(s) that do not contain the necessary information) 40 CFR 268.7

- a. EPA hazardous waste number

- b. Treatment standards (for wastes other than F001-F005 and F039, treatment standards may be referenced by including sub-category, treatability group, and CFR sections and paragraph where treatment standards appear)

- c. Where treatment standards is specified technology, applicable five-letter treatment code?

- d. Manifest number

- e. If the waste meets treatment standards, or if alternate treatment standards for lab packs are specified, does it have proper certification statement?

- f. Waste analysis data, if available.

- 3) Has the generator retained on-site a copy of all notices, certifications, waste analysis data, and other documentation produced pursuant to 268.7 for at least five (5) years? 268.7(a)(7)

T. RECORDKEEPING AND REPORTING

OK DF NI NA

- 1) Has the generator made a proper hazardous waste determination for all solid wastes generated at the facility, including correct LDR treatability group and treatment standard?

40 CFR 262.11 and 40 CFR 268.7(a) & 268.9 (HWIMS 100)

No hazardous waste determination has been done for leachate.

See DOV #1

- a. If DF, list below:

Assigned Classification	Correct Classification
_____	_____
_____	_____
_____	_____

- b. Which of the following methods does the generator employ for waste determination?

i. Knowledge of waste.

ii. Analysis. Specify Not Done

- 2) Are all test results and analyses needed for hazardous waste determinations retained for at least three years?

40 CFR 262.40

(HWIMS 180)

See DOV #1

- 3) Has the generator submitted biennial reports as required? 329 IAC 3.1-7-14)

(HWIMS 180)

Inactive site

Has not routinely generated waste.

U. WASTE MINIMIZATION

(HWIMS 100)

- 1) Does the generator have a written waste minimization plan?

____ _ ✓

- a. If a written plan is not available, briefly describe the waste minimization program as presented by the company representative.

- 2) Does the biennial report include the required waste minimization information?

OK DF NI NA

✓ _____ ✓
No repeat. See #3, pg 22

(40 CFR 265.75(h) and (J)/IC 13-7-27-7)

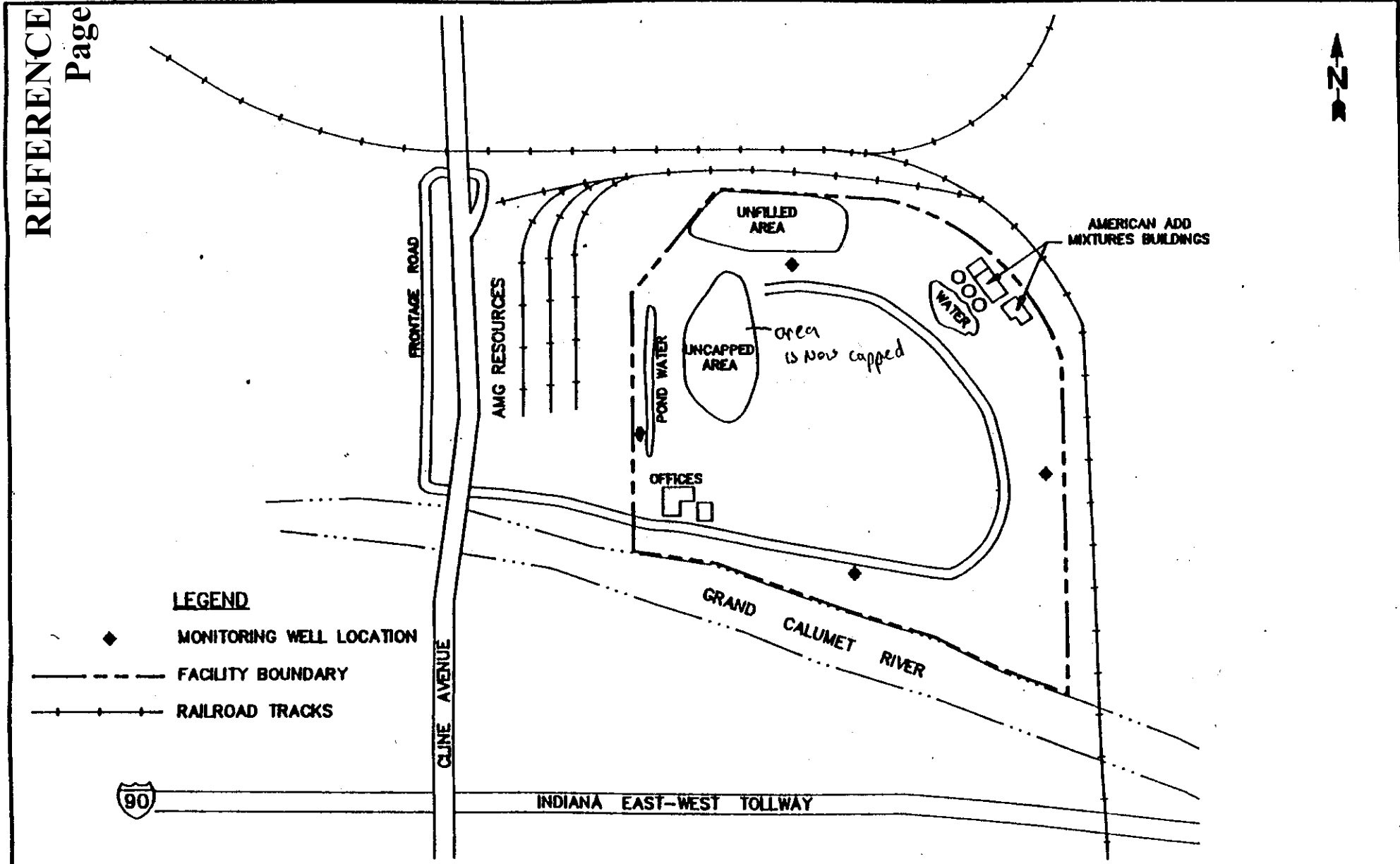
- 3) Note any discrepancies between the written or oral plan, and observed on-site waste minimization activities.

DRAW A SITE MAP; identify site of all hazardous waste activity, i.e. accumulation areas, storage areas, treatment areas, etc.

SEE NEXT PAGE

Remember to take photos and document as well as possible all violations!!!

24/4



GARY DEVELOPMENT COMPANY, INC. GARY, INDIANA	
FIGURE 1 FACILITY LOCATION AND LAYOUT	
PNC ENVIRONMENTAL MANAGEMENT, INC.	

SOURCE: MODIFIED FROM A GARY DEVELOPMENT COMPANY, INC., LOSS OF INTERIOR STATUS INSPECTION REPORT SKETCH DATED JUNE 1988

NOT TO SCALE

LANDFILL APPENDIX

40 CFR 265 Subpart N, 329 IAC 3.1-10-1
(HWIMS 460)

Location/Description of Unit Gory Development Co.

A. GENERAL OPERATING REQUIREMENTS

	OK	DF	NI	NA
1) Does the facility maintain a proper run-on control system? <u>40 CFR 265.302 (a)</u> <u>301 (f)</u>	—	✓	—	—
2) Does the facility maintain a proper run-off system? <u>40 CFR 265.302 (b)</u> <u>301 (g)</u>	—	✓	—	—
3) Are run-off and run-on collection and holding facilities managed or emptied expeditiously after storms? <u>40 CFR 265.302 (c)</u> <u>301 (h)</u>	—	✓	—	—
4) Is wind dispersal of hazardous waste managed? <u>40 CFR 265.302 (d)</u> <u>301 (i)</u>	✓	—	—	—
5) Has the owner or operator installed two or more liners and leachate collection systems in accordance with 40 CFR 264.301(e) with respect to waste received beginning May 8, 1985? <u>40 CFR 265.301</u>	—	✓	—	—

Please describe run-on and run-off control activities or any problems noted.

According to site foreman, landfill is covered with 3 foot clay
cap layer. There is no vegetative (top soil) on top of
clay cap. Erosion of clay cap was observed in some areas

B. SURVEYING AND RECORDKEEPING**OK DF NI NA**

1. Does the operating record include:
 - a. map, showing the exact dimensions including depth, of each cell with respect to permanent surveyed benchmarks.
40 CFR 265.309(a)
 - b. the contents of each cell and approximate location of each hazardous waste type within each cell.
40 CFR 265.309(b)

_____	_____✓_____	_____	_____
_____	_____✓_____	_____	_____

C. SPECIAL REQUIREMENTS FOR IGNITABLE AND REACTIVE WASTE

GDC has been out of business (closed, since 1989.

1. Is all ignitable or reactive waste treated, or otherwise rendered non-ignitable or non-reactive before or immediately after placement in the landfill.
40 CFR 265.312(a)
2. Are the general requirements for treatment of ignitable waste at 40 CFR 265.17(b) complied with. (e.g. Prevention of fires, explosions, toxic fumes, integrity of treatment devices, or threats to human, health, and environment, etc.)
40 CFR 265.312(a)
3. If ignitable or reactive waste is not rendered non-ignitable or non-reactive is the waste containerized and managed in a manner which prevents ignition of the waste.
40 CFR 265.312(b)

_____	_____	_____	_____✓_____
_____	_____	_____	_____✓_____
_____	_____	_____	_____✓_____

D. SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTE

1. Does the operators place incompatible waste in separate cells.
(See Appendix V for examples)
40 CFR 265.313

_____	_____	_____	_____✓_____
-------	-------	-------	-------------

OK DF NI NA

2. If incompatible waste is placed in the same cell as the general requirements at 40 CFR 265.17(b) complied with.
40 CFR 265.313

— — — — ✓

E. SPECIAL REQUIREMENTS FOR BULK AND CONTAINERIZED LIQUIDS

1. Has the facility complied with the prohibition against placement of bulk or non-containerized liquid hazardous waste or hazardous waste containing free liquids in the landfill.
(40 CFR 265.314(b))

— — — — ✓

2. Has the facility placed any non hazardous liquids in the landfill without permission of the commissioner.
40 CFR 265.314(f)

— — — — ✓

3. Has the facility complied with the requirements for containers holding free liquids:
40 CFR 265.314(c)

- a. All free liquids have been removed , or
b. has been mixed with absorbent or solidified, or
c. only containers designed to hold free liquids for use other than storage have been accepted (e.g. capacitors, lab packs (see 40 CFR 265.316)

— — — — ✓

4. Does the facility use the "Paint Filter Liquids Test" to check for the presence of free liquids according to the procedures specified in their waste analysis plan.
40 CFR 265.314(d)

— — — — ✓

F. SPECIAL REQUIREMENTS FOR CONTAINERS

1. With the exception of very small containers such as ampules are all containers at least 90% full when placed in the landfill
(40 CFR 265.315(a))

— — — — ✓

OK	DF	NI	NA
----	----	----	----

2. If not 90% full are the containers crushed, shredded, or similarly reduced in volume before burial in the landfill.
(40 CFR 265.315(b))

—	—	—	✓
---	---	---	---

G. LAB PACKS

1. Has the facility placed in the landfill only lab packs which have been packaged and prepared in accordance with
40 CFR 265.316.

—	—	—	✓
---	---	---	---

H. LDR REQUIREMENTS

(HWIMS 700)

1. Does the facility, in accordance with an acceptable waste analysis plan, test prohibited wastes prior to land disposal to ensure that all applicable treatment standards and/or prohibition levels have been met?
40 CFR 268.7(c)(2)
2. Does the facility test wastes to ensure that they do not exhibit any characteristic at the point of disposal?
40 CFR 268.9(c)
3. Does the facility land dispose of restricted wastes with a National Capacity Variance, Case-by-Case Extension, No-Migration Petition, or Treatment Standard Variance?
40 CFR 268.5, .6, .44

—	—	—	✓
---	---	---	---

—	—	—	✓
---	---	---	---

—	—	—	✓
---	---	---	---

4. If "yes,"

- a. Does operating record specify quantities, date of placement, copy of notification, and do disposal units meet requirements of 40 CFR 268.5(h)(2)?
40 CFR 264.73(b)(10)
- b. Do land disposal units meet the requirements of 40 CFR 268.5(h)(2)?

—	—	—	✓
---	---	---	---

—	—	—	✓
---	---	---	---

I. PREPAREDNESS AND PREVENTION

- | | <u>OK</u> | <u>DF</u> | <u>NI</u> | <u>NA</u> |
|--|-----------|-------------|-------------|-------------|
| 1) Security - Do security measures include:
<u>40 CFR 265.14</u> (HWIMS 300) | | | | |
| a. 24-hour surveillance which continuously
monitors and controls entry? | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
| or | | | | |
| b. Artificial or natural barrier around
facility and controlled entry at all times? | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
| c. Danger sign(s) at entrance? | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |

-
-
- | | | | | |
|---|----------|-------------|-------------|-------------|
| 2) Has the facility been maintained and (HWIMS 340, 810 spill)
operated to minimize the possibility of a fire,
explosion, or release of hazardous waste or
hazardous waste constituent? <u>40 CFR 265.31</u> | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
|---|----------|-------------|-------------|-------------|
-
-

- | | | | | |
|---|----------|-------------|-------------|-------------|
| 3) If required, does the facility have
the following equipment: (HWIMS 340) | | | | |
| a. Internal communications or alarm systems?
<u>40 CFR 265.32(a)</u> | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
| b. Telephone or 2-way radios at the
scene of operations?
<u>40 CFR 265.32(b) & 40 CFR 265.34(b)</u> | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |

- | | <u>OK</u> | <u>DF</u> | <u>NI</u> | <u>NA</u> |
|---|-----------|-------------|-------------|-------------|
| c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
| d. Water at adequate volume and pressure to supply water hoses, foam equipment, automatic sprinklers or water spray equipment available? (Please specify)
<u>40 CFR 265.32(d)</u> | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
| 4) Whenever waste is being handled do all personnel have immediate access to an alarm or communication device (thru another employee if always available)?
<u>40 CFR 265.34(a)</u> (HWIMS 340) | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |

J. TESTING AND MAINTENANCE OF EMERGENCY (HWIMS 340)

Equipment:

- | | | | | |
|---|-------------|-------------|-------------|-------------|
| 1) Has the owner or operator established testing and maintenance procedures for emergency equipment?
<u>40 CFR 265.33</u> | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
| 2) Is emergency equipment maintained in operable condition? <u>40 CFR 265.33</u> | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
| 3) Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas)
<u>40 CFR 265.35</u> (HWIMS 340) | <u> </u> | <u> </u> | <u> </u> | <u>✓</u> |

PREINSPECTION FILES AUDIT
CHECKLISTDATE: 1/31/95BY: RJBCOMPANY: Gary Development Co.LOCATION: Gary, IndI.D.#: IND/077/005/916Type of Inspection: G—T—TSD—Closure—Complaint—Other (Please specify)A. GENERAL

	<u>YES</u>	<u>NO</u>	<u>NI</u>
1. Federal Notification on File	<u>—</u>	<u>X</u>	<u>—</u>
2. Federal Part A on File	<u>X</u>	<u>—</u>	<u>—</u>
3. Closure Plan Reviewed (In Federal court)	<u>—</u>	<u>X</u>	<u>—</u>
4. Contingency Plan Reviewed	<u>—</u>	<u>—</u>	<u>X</u>
5. Biennial Report Reviewed	<u>—</u>	<u>—</u>	<u>X</u>
6. Part B Permit Reviewed	<u>—</u>	<u>—</u>	<u>X</u>

(Note any Special Permit Conditions)

Comments:

Gary Dev. Co. is an inactive landfill, accepted waste 75-89.In 1981 "allegedly accepted hazardous waste" (F001, F002, F003, F005, F006)B. NOTIFICATION DATA (Notify type, waste codes listed, etc.)Part A indicates F003, F005, F006, K087C. LAND DISPOSAL INFORMATION

1. List Waste and Land Disposal Facility

Gary Development received H2 waste from off-site
a landfilled H2 wastes in 1980's

D. LIST POSSIBLE WASTE STREAMS NOT LISTED ON BIENNIAL REPORTNot receiving wastes nowE. LIST WASTE MANAGEMENT PRACTICES WHICH MAY REQUIRE A PERMITF. FEDERAL PART A (Handling Codes), OR PART B PERMIT

	<u>Code</u>	<u>Amount</u>	<u>Unit of Measure</u>
1.	<u>D80</u>		
2.			
3.			
4.			
5.			

G. CLOSURE/POST-CLOSURE

1. Are there any closed units? If yes, describe.

Closure has not been completed yet.H. COMPLIANCE BRANCH

List past two inspections and enforcement actions (CO, NOV, VL, WL)

<u>Date of Inspection</u>	<u>Action Type</u>	<u>Date of Action</u>
<u>1/13/93</u>	<u>Referral to EPA</u>	<u>2/93</u>
<u>2/18/92</u>	<u>Referral to EPA</u>	<u>9/92</u>

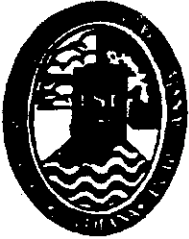
I. LIST UNRESOLVED ENFORCEMENT ACTIONS/VIOLATIONS

No Idem violations

J. BRIEFLY SUMMARIZE PREVIOUS VIOLATIONS. (Note if they are repeats)K. LIST ANY ITEMS UNDER COMPLIANCE SCHEDULES WHICH ARE NOT YET COMPLETED OR NEED FIELD VERIFIED. INCLUDING WASTE MINIMIZATION REQUIREMENTS IN ENFORCEMENT ORDER AND SETTLEMENT AGREEMENTS.L. COMMENTS

Mirtha Capiro, EPA region 5, ^{case manager} (312) 886-7567

said nothing has been decided on site. Judge
is yet to make decision.



Indiana Department of Environmental Management

VERIFICATION OF INSPECTION

This is to verify that on Feb. 1 1995 an inspection of _____Gary Development Co. Inc. was conducted by the

undersigned representatives of the Indiana Department of Environmental Management, Office of Solid and Hazardous Waste Management. The inspection was conducted to determine compliance with the Resource Conservation and Recovery Act (RCRA), IC 13-7, and rules promulgated pursuant to those statutes.

A summary of violations and concerns noted during the inspection were verbally communicated to the undersigned company representatives during the inspection. The company is encouraged to correct deficiencies as soon as possible. Corrections made and verified during the inspection may still be cited as violations; however, prompt action will be taken into consideration in determining the resolution to any enforcement action which may be taken.

Your company will be sent a preliminary summary of the violations identified as a result of the inspection within thirty (30) days of the inspection. The summary may identify violations not noted during the inspection if they surfaced as a result of a more extensive analysis of the rules or further review of records in the possession of the Department. The company is encouraged to contact the inspector to clarify any misunderstandings which you believe may be reflected in the inspection summary.

IDEM: Printed Name	Signature	Position	Phone #	Date
Robert Bloesing	<i>Robert Bloesing</i>	EM II	219 881-6712	2/1/95

Company: Printed Name	Signature	Position	Phone #	Date
GARY DEV. CO INC.	<i>James H. Hoge</i>	FOREMAN	219- 944-7858	2/1/95

Company Mailing Address

P.O. Box 6056

Gary, Ind. 46406

DESCRIPTION OF VIOLATIONS
Gary Development Corporation
IND 077 005 916
INSPECTION OF January 30,1995

The following on-going violations were noted during the inspection. Site conditions have not changed since the previous inspection. These violations are being addressed in on-going enforcement actions.

1. Page #8 40 CFR 265.13(a)1
 Page #19 Gary Development Corporation had not made any waste determinations
 for leachate from the landfill.
2. Page #9 40 CFR 265.13(b)
 Gary Development Corporation did not have a detailed waste analysis
 plan on file at the facility.
3. Page #9 40 CFR 265.15(a) and (b)2
 Page #10 The Operator had not conducted inspections of the facility for
 deteriorations, malfunctions, operator errors and discharges of hazardous
 waste, nor does the facility have an inspection schedule at the facility.
4. Page #11 40 CFR 265.15(d)
 The facility did not maintain an inspection record or log of operator
 inspections at the facility.
5. Page #12 40 CFR 254.16(d)(1), (2), (3) & (4)
 The facility did not have any personnel training records at the facility
 for review.
6. Page #13 40 CFR 265.51
 Page #14 Gary Development Corporation did not have a facility contingency plan
 on-site available for review by the inspector, nor had the facility
 attempted to make arrangements with local authorities.
7. Page #16 40 CFR 265.112(a) & 329 IAC 3.1-14-3
 The facility did not have the closure and post closure plan available on-
 site for review by the inspector, nor closure and post closure cost
 estimates available.
8. Page #16 40 CFR 254.73(a)
 The facility did not have an operating record.
9. Page #25 40 CFR 265 Subpart N & 329 IAC 3.1-10-1
 through All or the violations in this part of the report
 Page #30 (Landfill Appendix) are being cited as part of an on-going enforcement
 action between the USEPA and Gary Development Corporation,
 regarding hazardous waste landfiling activities at the site.